

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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MIKAYLA MARIE LERETTE,

Plaintiff,

Case No: 25-CV-183

v.

THE CITY OF SUPERIOR, WISCONSIN,  
THOMAS CHAMPAIGNE, JOHN KIEL,  
JEFFREY HARRIMAN, AND MICHELLE POPE,

Defendants.

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**DECLARATION OF THOMAS CHAMPAIGNE**

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1. I am an adult resident of the State of Minnesota and make this declaration voluntarily based upon my own knowledge.

2. I was hired as Captain of Investigations for the Superior Police Department in September 2016 and served in that role until March 2024.

3. As Captain of Investigations, I supervised Lieutenant Michelle Pope and Investigator Mikayla LeRette.

4. I consulted with Human Resources in December 2022 to determine whether LeRette could safely continue working as a narcotics investigator and whether any accommodations were necessary.

5. I was also concerned for the safety of Investigator LeRette and her unborn child, as police officers may be involved in unpredictable and potentially dangerous situations.

6. During my tenure, the Superior Police Department had not previously had a pregnant officer assigned to narcotics, and I was uncertain how to proceed in light of those safety concerns.

7. No action was taken to remove Investigator LeRette from her role as a narcotics investigator due to her pregnancy.

8. I did not state or recommend that Investigator LeRette be removed from narcotics due to her pregnancy.

9. I do not ever recall any statement by then-Captain Winterscheidt regarding the need for a lactation space in the department.

10. I recall Investigator LeRette indicating that the locker room was an acceptable location for expressing breast milk.

11. When Investigator LeRette went on maternity leave in August of 2022, her partner, Ronald Custer, was reassigned to patrol because Custer could not conduct narcotics investigations without a partner.

12. Upon LeRette's return, Investigator LeRette remained on light duty and did not have a narcotics partner, as Officer Custer remained on patrol through the January 2023 bid cycle.

13. Because there were no active narcotics investigations at that time and because LeRette was on light-duty, Investigator LeRette was assigned to the property room, which required additional staffing support.

14. Other officers on light duty, including Officer Kelsey Davis, were also assigned to the property room.

15. On November 9, 2022, I emailed Investigator LeRette and Officer Davis a copy of the department's uniform policy while they were assigned to the property room. A true and correct copy of that email is attached as **Exhibit B**.

16. Officers assigned to the property room were expected to comply with uniform requirements.

17. This expectation applied equally to all officers assigned to the property room.

18. It was the standard practice of the Department that officers on light duty, regardless of gender, were not permitted to carry firearms, drive department vehicles, or leave the station during work hours.

19. Upon returning from maternity leave in November of 2022, Investigator LeRette requested to work a modified schedule of four ten-hour days rather than five eight-hour days.

20. Such scheduling arrangements were subject to departmental approval and discretion.

21. Investigator LeRette was approved to work four ten-hour days.

22. Her requested days off varied from week to week rather than being consistent. This made her schedule uniquely difficult to monitor.

23. While Pope was away at the FBI Academy from September 2023 through December 2023, Investigator LeRette occasionally failed to communicate her requested days off, requiring follow-up by supervisors.

24. Officers under my supervision were required to notify me or Lieutenant Pope of any deviations from their assigned schedules.

25. As Captain, I was responsible for knowing how personnel were spending their work time.

26. Investigators assigned to task forces were expected to communicate schedule deviations to both their task force and department supervisors prior to the deviation.

27. I did not have scheduling issues with Investigator Tim Monte and he would consistently inform both Lieutenant Pope and I if he would be deviating from his normal schedule.

28. Because LeRette's schedule changed weekly, Investigator LeRette was required to notify me or Lieutenant Pope of schedule deviations before each week.

29. Sometime following LeRette's return to work, I observed that Investigator LeRette had added workout time to her schedule.

30. I attempted to verify that she was working out in the department gym as required by policy but did not observe her there during the scheduled time.

31. I later reminded Investigator LeRette of the requirement to complete workouts in the department gym.

32. I do not recall ever stating that detectives or investigators were prohibited from working out while on duty, and I never prevented Investigator LeRette from working out while on duty.

33. On September 18, 2023, a meeting was held with Lieutenant Pope, Investigator LeRette, Investigator Custer, and me regarding their failure to meet investigative performance expectations.

34. That meeting addressed performance concerns only and was unrelated to LeRette's to sex or pregnancy.

35. We considered reassigning both investigators to patrol due to performance deficiencies.

36. In late 2023 or earlier 2024, I observed discrepancies between Investigator LeRette's reported work hours and her apparent work activity.

37. On multiple occasions during scheduled work hours, I observed Investigator LeRette at her residence.

38. For example, on February 22, 2024, Chief Winterscheidt stated that he was having day-care issues but would still come in for a meeting.

39. Before that meeting, I observed Investigator LeRette's work vehicle parked at her residence during her scheduled work hours.

40. Later that same day, I observed Investigator LeRette return to her residence in a personal vehicle with her child—still during her scheduled work hours.

41. LeRette had not taken time off for that time period, despite being previously instructed to inform me of her deviations.

42. Investigator LeRette's assigned City-owned vehicle, which was used for work purposes, was unmarked and did not have built-in GPS tracking.

43. The marked city-owned vehicles did have built-in GPS tracking.

44. To investigate this potential misconduct as described above, I placed a tracking device on the City-owned vehicle assigned to Investigator LeRette in February or March of 2024.

45. When Investigator LeRette switched vehicles, I transferred the tracking device accordingly.

46. In March of 2024 I informed incoming Captain Jeffrey Harriman of my concerns and provided him with the tracking information.

47. I retired from the Superior Police Department in March 2024.

48. After my retirement, I did not access any data from the tracking device.

49. I did not observe Investigator LeRette being treated differently based on her sex.

50. I did not observe Investigator LeRette being treated negatively due to her pregnancies, parental leave, or lactation needs.

51. I did observe instances in which Investigator LeRette appeared to receive preferential treatment due to her relationship with Chief Winterscheidt.

52. For example, after the Narcotics Unit was disbanded, I told Winterscheidt that both Investigator LeRette and Investigator Custer should be reassigned to patrol due to their poor performance as investigators. While Custer was reassigned to patrol, Winterscheidt instead assigned LeRette to another task force.

53. At no time did I hold any bias against Investigator LeRette based on her sex or pregnancies, nor did I treat her differently on that basis.

54. Attached as **Exhibit L** is a true and correct copy of a report drafted recapping the September 18, 2023, meeting Lieutenant Pope and I had with Investigator LeRette and Investigator Custer.

55. Attached as **Exhibit S** is a true and correct copy of an email sent by Chief Alexander on November 21, 2022, indicating that LeRette could no longer work in the property room.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed this 17th day of April, 2026.

BY: /s/ Thomas Champaigne